



# Hartlepool Local Planning Framework Emerging Local Plan

## Matter 2

### Spatial (Locational) Strategy



September 2017



## **Issue 1 – Does the overall spatial strategy for the Plan present a positive framework which is consistent with national policy and will contribute to the achievement of sustainable development?**

### ***Spatial Vision, Themes and Objectives and Policy LS1 Locational Strategy***

- Q1. Is the Plan, based on the spatial portrait and sustainability appraisal baseline, providing an appropriate response to address the issues that influence the Borough as a place? Do the spatial objectives of the Plan accurately reflect the existing issues and future opportunities / challenges facing Hartlepool Borough?**

The Scoping Report (HLP01/23) for the Sustainability Appraisals was refreshed as part of the consultation on the Issues and Options Stage of the Local Plan. A key driver within the Scoping Report was the Hartlepool Community Strategy (HLP11/1) for Hartlepool; it describes a long-term vision – Hartlepool’s ambition and aspirations for the future: “Hartlepool will be an ambitious, healthy, respectful, inclusive, thriving and outward-looking community, in an attractive and safe environment, where everyone is able to realise their potential.” The Vision is further articulated through priority aims and associated objectives grouped into eight themes: 1. Jobs and the Economy. 2. Lifelong Learning & Skills. 3. Health & Wellbeing. 4. Community Safety. 5. Environment. 6. Housing. 7. Culture & Leisure. 8. Strengthening Communities.

The Scoping Report also sets out 15 Sustainability Objectives to assess plans for their economic, environmental and social objectives.

The Local Plan has been developed to be the spatial representation of the vision of the Community Strategy. The plan reflects the economic vision of not only the Community Strategy, but also the Combined Authority, in creating new jobs and prosperity over the coming years. Through working with a bottom up approach, recognising the importance of retaining the younger population as they leave college and university, by providing a range of job opportunities within the town and wider Tees Valley, the plan will help to drive economic growth and the associated benefits. This economic growth is also important in terms of housing growth and this is justified through the SHMA (HLP06/2), the SHMA Addendum (HLP06/1) and the Housing and Economic Growth Topic Paper (Ex/HBC/24).

Through the assessment of Housing sites within the SHLAA (HLP06/4) and considering the issues that influence the Borough as a place (for example the geography of the town and the limiting factors to growth such as the industrial area to the south), the existing issues and future opportunities / challenges, the plan has proposed a range of housing sites to create sustainable communities (through the implementation of a variety of policies within the plan) in a range of locations which help to address the economic, environmental and social needs of the borough over the next 15 years.

One of the other key challenges the plan is seeking to address is limited safe and high quality access into the town via road and is seeking to implement a new grade separated junction and bypass at Elwick which will create a third safe access to the town from the A19.

- Q2. (a) Is the location and distribution of development appropriate and justified?**

The Council considers that the location and distribution of development is appropriate and justified. In employment terms the plan relies greatly on existing sites and sets out policies which provide clear guidance on the uses which are appropriate on each site and indicates the quantum of available land at each location. The proposed prestige employment allocation at Wynyard is considered crucial to attract international and national companies to the area and the site benefits from good access to the A19 and A1

which can be a crucial factor in the decision making of companies to locate to the region. The employment growth is also considered a vital factor in the creation of a sustainable community at Wynyard. In terms of the housing allocations proposed only sites identified as suitable, achievable and available within the SHLAA (HLP06/4) assessment were considered in forming a growth strategy for the town. The Council wanted to ensure that there was a range of housing sites provided which would reduce reliance on one particular site whilst still ensuring that sustainable new communities could be formed which meant the scale of developments in areas such as Wynyard, High Tunstall / Quarry Farm and Hart village had to be of a quantum which allowed the delivery of a range of infrastructure. The alternative growth scenarios considered and discounted as less sustainable are identified within the SA Addendum (EX/HBC/25).

**(b) Has the preparation of the plan considered reasonable alternative spatial strategies? Does the updated SA Addendum (EX/HBC/25) capture the reasonable alternative strategies (see pages 10-16) and unreasonable growth alternatives (see pages 17-19) and present cogent reasons why they are not reasonable or preferred options?**

The Council believes that it has fully considered all growth options and that the strategy for growth as set out within the Publication Local Plan is the most appropriate and sustainable spatial strategy. The Council's justification for this spatial strategy is set out within the SA Addendum at pages 10-19 (EX/HBC/25).

**Q3. Has the Plan maximised the potential re-use of previously-developed land in the plan area? Is the Council progressing a Brownfield Land Register of those sites appropriate for residential development?**

The Council has had to rely on Greenfield developments due to the lack of deliverable brownfield sites within the urban area. Where brownfield sites do exist there were concerns over their achievability due to a range of factors such as contamination or flooding concerns. It should be noted that a number of brownfield sites are contained within the existing planning permissions which have been included as part of the deliverable permissions. The previous 2006 Local Plan relied on a major brownfield site at the Port (Victoria Harbour) however this land is not available due to the owners wishing to pursue other employment options relating to renewable energy.

Whilst not specifically identifying sites, the Local Plan makes an assumption that areas of housing within the central areas of Hartlepool will have to be demolished and renewed over the plan period. The Council has produced the Demolitions and Replacements evidence paper (EX/HBC/62) to provide further clarity on this area of the plan. The Council has a proven track record in the delivery of HMR schemes over the past 15 years and will work with delivery partners such as Registered Providers and the HCA to ensure the successful delivery of schemes over the plan period. The Demolitions and Replacements paper demonstrates that 1900 demolitions will take place over the next 15 years within central areas and will be replaced on site at a rate of 50% meaning that 950 new homes will be built on brownfield sites over the plan period (with the other 50% being replaced through other allocations within the plan).

The Council is working with the Combined Authority on a Housing Investment Plan to cover the Tees Valley and will also produce a Brownfield Land Register by December 2017.

**Q4. Is the Plan strategy over-reliant on a small number of large strategic sites?**

The Council does not believe the site is over reliant on a small number of large strategic sites. It is considered that the spatial strategy of the Local Plan spreads the delivery risk given that there are a range of sites of a strategic nature including the South West Extension, High Tunstall & Quarry Farm, Wynyard and other larger

planning permissions including Upper Warren and the Britmag site. These larger sites are supported by a range of other smaller sites which will help to ensure a balanced delivery over the plan period.

**Q5. Does the Plan strike an appropriate balance of growth at the two strategic locations of High Tunstall and Wynyard? Does the balance need to be adjusted (up or down) at either location for sustainability and/or delivery reasons?**

The Council considers that the plan strikes an appropriate balance in terms of the growth at High Tunstall and Wynyard. Information within the SA Addendum (EX/HBC/25) provides justification as to why the proposed growth strategy is the most appropriate in sustainability terms. Both areas require highway infrastructure and community infrastructure including a primary school, local centre and recreation and leisure facilities. Obviously the delivery of these elements requires a certain size of development to ensure the infrastructure is deliverable. The Deliverability Risk Assessment (EX/HBC/64) which has been produced illustrates the deliverability of each site at the scale proposed within the Local Plan. The assessment illustrates that the Grade Separated Junction and bypass at Elwick, at a cost of £18million, requires a scale of development in the region of 1500 homes to repay the cost of the bypass if no grant funding is secured.

However, the assessment illustrates that this means that other elements such as affordable housing are not deliverable if the bypass needs to be repaid through the s106. However, if National Productivity Investment Fund (NPIF) grant is secured this significantly reduces the price per dwelling cost of the bypass and enables the other elements required. This situation becomes even more positive if the Housing Infrastructure Fund (HIF) is secured.

Creating a sustainable community at Wynyard is a fundamental element of the plan. Policy Inf4 allocates an area where community facilities will be provided to provide an integral part of the sustainable community alongside the new housing and employment opportunities; there is also a need to provide £5m of improvements to the A19/A689 junction including the provision of a pedestrian bridge and the deliverability risk assessment illustrates that at the proposed quantum of development that all of these facilities and infrastructure improvements can be funded through the housing development. A reduction of housing in this location could impact on the ability to fund these crucial pieces of infrastructure meaning that a sustainable community is not created.

**Q6. Does the locational strategy, in combination with Policies RUR1 and RUR2, provide an appropriate spatial strategy for the rural areas? Is it overly restrictive and is there an alternative, more flexible approach that would allow the rural areas to make an appropriate contribution to ensuring a deliverable housing supply?**

Yes, the Council believes that the locational strategy, in combination with Policies RUR1 and RUR2, provides an appropriate spatial strategy for the rural areas of Hartlepool which will help to meet the objectives of the Local Plan.

Paragraph 49 of the NPPF stipulates that housing applications should be considered in the context of the presumption in favour of sustainable development. It is not considered that the provisions of RUR1 prevent this. Paragraph 49 also indicates that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year-supply of deliverable housing sites. The plan has identified and allocated sites (including existing planning permissions) for a total of 6,199 dwellings, above that of the Objectively Assessed Need (OAN) requirements and taking into account replacement of demolitions and a 20% buffer over the plan period. It is considered that the Council can therefore demonstrate a five year supply of deliverable housing sites. This figure and the corresponding allocations and extant planning permissions include sites within the urban area, on the edge of the urban

area and in rural villages that are considered to be sustainable. If there are further windfall developments during the plan period these will be expected to be within the urban area or Village Envelopes and it is considered housing development in the open countryside, beyond the development limits, that does not comply with RUR2, would not constitute sustainable development.

The criteria set out within RUR2 are considered to be in accordance with paragraph 55 of the NPPF. Most of the land in the Borough which falls outside of development limits can be characterised as being “countryside”. Therefore most dwellings proposed outside of the development limits will be, by definition, “development in the countryside”. Whilst it is acknowledged that development well related to sustainable settlements can be appropriate, it is considered that sufficient sites have been identified and allocated within and adjacent to the existing sustainable rural settlements to adequately meet the housing requirements of the Borough over the plan period. As such it is not considered that these policies or spatial strategy for the rural area is overly restrictive or a more flexible approach would be appropriate.

- Q7. Would the delineation of ‘limits to development’ and the identification of a strategic gap restrict sustainable development? What would be a reasonable alternative policy that would provide sufficient certainty to communities and developers as well as efficient and effective decision making?**

The Council considers that setting limits to development will ensure development occurs in sustainable locations, within or adjacent to existing built areas, which will support the vitality and viability of existing centres, reduce reliance on unsustainable forms of travel and protect the character of the rural area and rural villages. Similarly, the strategic gap emphasises the importance of protecting the character and distinctiveness of the rural villages. It is considered the only alternative would be to not set limits to development or designate a strategic gap, however this would be unreasonable as it would encourage less sustainable development and would not provide certainty to communities, developers or decision makers in terms of what types of development would be acceptable and where.

- Q8. Is the delineation of the strategic gap reasonable in terms of its primary objectives in Policy LS1? Are there any comments on the suggested amendments in the Council’s evidence (EX/HBC/22 – pages 46-54) to the proposed strategic gap? Does the Council intend to propose any modifications to reflect these suggested amendments?**

The Council considers that the delineation of the Strategic Gap is reasonable and necessary to protect the character and distinctiveness of the rural villages from urban sprawl, this is reflected in the primary objectives of the emerging policy set out in LS1, and it is considered that the appropriateness of the designation in terms its extent and effectiveness is demonstrated through the Strategic Gap Assessment (EX/HBC/22). The Council considers that the proposed amendments to the Strategic Gap set out in the Strategic Gap Assessment are appropriate and reflect the findings of the report. As such, an amendment to the Proposals Map (HLP01/2) to this effect is proposed and shall be set out in an updated Amendments to Proposals Map Document and Proposals Map Modifications document.

- Q9. Does the strategic gap evidence lend support to the Home Builders Federation suggestion [representation Pub0108] and others that there are areas of lesser value (or higher capacity) that could serve as contingency or reserve areas?**

Whilst it is acknowledged that the Strategic Gap Assessment (EX/HBC/22) demonstrates that there are areas of lesser value/higher capacity, primarily within areas adjoining the existing built up area, these typically perform well in terms of their effectiveness in maintaining separation between the main urban area and

rural villages and achieving the objectives of the Strategic Gap. It is not considered that these areas should be designated as contingency land as the Council considers the most appropriate sites for development have been allocated and these are sufficient to meet the housing need over the plan period, which includes a 20% buffer to allow for greater flexibility and an additional 20% frontloaded into the first 5 years from the back end of the plan period to account for previous persistent under delivery of housing, in accordance with paragraph 47 of the NPPF. However, it is acknowledged that the extent of the strategic gap may need to be reviewed following the plan period to take account of updated housing need and the changing nature of the landscape and the adjacent urban areas over time.

**Q10. Is there reasonable consistency between the emerging Neighbourhood Plans and the strategy and policies in the Local Plan? Does the Local Plan avoid duplicating planning processes that will apply to the neighbourhood areas<sup>1</sup> ?**

The Hartlepool Rural Plan has received the Inspectors Final Report and the recommendations within the report were [accepted](#) at Regeneration Services Committee on 4<sup>th</sup> September 2017. One area of conflict related to a site at Glebe Farm, Hart that the Council have included within their plan but the Rural Neighbourhood Plan did not include. The inspector for the Rural Plan recommended that the Glebe Farm site is put into the Rural Plan and that recommendation was agreed. As a whole the Rural Plan is considered to be consistent with the Council's plan.

The development of the Rural Neighbourhood Plan and the Hartlepool Local Plan has broadly been developed along a similar timeline, with officers and residents working closely to develop both plans. There are some areas of duplication within both plans as both plans propose housing on some of the same sites, it was not possible to avoid such duplication as it was necessary for the Council to progress with submission of their plan (Publication Draft December 2016 ) prior to the Council agreeing the inspectors findings for the rural plan.

The Wynyard Neighbourhood Plan is in the early stages, the draft plan proposes development within the Wynyard area but the quantum's differ from the quantum's in the Hartlepool Plan. Notwithstanding the variations of quantum's of housing etc the plan is deemed to be broadly consistent with the Council's plan. Given that the Wynyard plan and the Headland are in the early stages of development, any duplication has been unavoidable as it was necessary to progress with the Council plan to ensure that a policy framework could be established as soon as possible.

**Q11. The NPPF at paragraph 156 refers to the need to identify strategic priorities and states at paragraph 184 that Neighbourhood Plans must be in 'general conformity with the strategic policies of the Local Plan'. Is the Plan clear on those policies which should be regarded as strategic policies for the purpose of neighbourhood plan preparation?**

All policies within the plan are deemed to be 'strategic policies' this is set out in paragraph 1.6 of the Publication Draft Local Plan.

---

<sup>1</sup> PPG paragraph 043 Reference ID: 41-043-20140306

- Q12. Is policy RUR1 reasonable to require development to be in accordance with the Rural Neighbourhood Plan (RNP)? What stage has the RNP progressed to?**

It is reasonable to require development to be in accordance with the Rural Neighbourhood Plan. It is a statutory requirement to ensure that development accords with the development plan, which includes neighbourhood plans, unless material considerations allow otherwise. It is acknowledged that is not necessary to repeat statutory requirements. However, the text within the policy assists in providing clarity to applicants and other interested parties.

- Q13. What is the purpose of the New Dwellings Outside of Development Limits SPD? Will it introduce policy content that ought to be in the Local Plan?**

The purpose of the New Dwellings Outside of Development Limits SPD is to provide additional detailed guidance with respect to the requirements of RUR2, including whether the principle of a new dwelling in the countryside is likely to be appropriate and when a justification test will be required and details what information the applicant will be required to submit as part of this. MM/CHP12/02 in EX HBC 15, Proposed Main Modifications Issue 1 details a change in the policy wording to provide greater clarity with respect to the criteria set within RUR2.